Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510 New York, New York 10165

jbarton@faillacelaw.com

Telephone: (212) 317-1200 Facsimile: (212) 317-1620

February 19, 2020

ELECTRONICALLY FILED

USDC SDNY

DOCUMENT

DATE FILED:

DOC #:

MEMO ENDORSED

BY ECF

Hon. Valerie E. Caproni United States District Judge Thurgood Marshall United States District Court 40 Foley Square New York, NY 10007

Re: Aucacama v. CP Prince St LLC (d/b/a Coco Pazzo), et al.;

Case No. 19-cv-4245

Your Honor:

I am an attorney with the office of Michael Faillace & Associates, attorneys for Plaintiff in the above-referenced matter. I write to respectfully request the status conference scheduled for February 28, 2020 be adjourned by thirty days. This is the first request of its kind and is submitted on consent.

The parties have finalized their settlement agreement, but anticipate needing more time to get it fully executed. The parties also need more time to finalize their fairness motion. As such, the parties respectfully request that both the deadline to submit their agreement to the Court, and the upcoming status conference, be adjourned by thirty days.

Application GRANTED. The proposed settlement agreement and fairness motion are due no later than March 17, 2020. If none is submitted, then the Court will hold a hearing on March 20, 2020, at 10:00 a.m.

SO ORDERED.

Respectfully Submitted,

/s/Jesse Barton
Jesse Barton
Michael Faillace & Associates, P.C.
Attorneys for Plaintiff

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE

¹ The parties also request that the deadline to submit their agreement to the Court of February 24, 2020 be extended by thirty days.